

MAR 11 2002

AMERADA HESS CORPORATION

William Anderson
PRODUCTION SUPERINTENDENT

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March 8, 2002

Attn: Rules Processing Team (RPT)
Department of the Interior, Minerals Management Service; MS 4024
381 Elden Street
Herndon, Virginia 20170-4817

Re: Notice of Proposed Rulemaking
Procedures for Dealing with Sustained Casing Pressure

Gentlemen:

Amerada Hess Corporation appreciates the opportunity to comment on the proposed rulemaking. We are in agreement with the comments on the proposed rulemaking submitted by the Offshore Operators Committee (OOC). Further, we believe that the three-prong approach as outlined in the OOC comments is a more effective method for reducing risk and improving safety in a cost effective manner than a continued prescriptive regulatory approach to sustained casing pressure.

In addition to supporting the OOC comments, we would like to highlight a few of the areas in the proposed rulemaking that we believe pose significant impacts on our operations in the Gulf of Mexico.

1. The proposed prescriptive increase in casing pressure monitoring requirements.
2. The requirement to pump into casings to replace fluids lost during bleeding operations.
3. The requirement to repair or plug wells with SCP that are inactive for one year or longer, or that will not be returned to production in the foreseeable future.
4. Required monitoring of all casing annuli in subsea wells.
5. Lack of differentiation between high and low casing pressures and the relative risks associated with each.

We appreciate your careful consideration of all of the comments concerning this rulemaking.

Sincerely,



William D. Anderson
Production Superintendent